

CLARK COUNTY SCHOOL DISTRICT
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Attorneys for Defendants Clark County School District,

Todd Petersen, Tina Miller, Zach Stork and Connie McGrandy

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JARON BRIGNAC,

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT;
MANION MIDDLE SCHOOL; TODD
PETERSEN; TINA MILLER; CONNIE
MCGRANDY; ZACH STORK, and DOES 1
through 20,

Defendants.

CASE NO. 2:25-cv-00215-EJY

**DISCOVERY PLAN AND
SCHEDULING ORDER ~~(PROPOSED)~~**

SPECIAL SCHEDULING REVIEW
REQUESTED

Pursuant to Fed. R. Civ. 26(f) , Local Rule 26-1(b), ECF No. 28 and ECF No. 29, Plaintiff JARON BRIGNAC (“Plaintiff”) and Defendants CLARK COUNTY SCHOOL DISTRICT, TODD PETERSEN, TINA MILLER, ZACH STORK AND CONNIE MCGRANDY (hereinafter collectively referred to as “CCSD Defendants” or “CCSD”), hereby submit the following Stipulated Discovery Plan and Scheduling Order. The parties request a discovery period of 180 days. However, in light of the procedural history of this matter detailed below, the parties request the 180 days commence on June 16, 2025.

Plaintiff’s complaint was filed January 31, 2025. ECF No. 1. An Amended Complaint was filed February 6, 2025. ECF No. 7. On February 21, 2025, Defendants filed their Motion to Dismiss. ECF No. 11. On February 26, 2025, Plaintiff filed an Opposition to Defendants’ Motion

1 to Dismiss. ECF No. no. 14. On February 27, 2025 Defendants filed a Motion to Dismiss
2 Plaintiff's Amended Complaint. ECF No. 15. On March 3, 2025, Plaintiff filed a Motion for
3 Leave to file a Second Amended Complaint. ECF No. 19. On March 12, 2025, Defendants filed
4 a Motion to Stay Requirement to File Proposed Discovery Plan and Scheduling Order. ECF No.
5 23. On March 28, 2025, this Court addressed Defendants' Motion for Stay and entered an Order
6 which states in part,

7 Accordingly, IT IS HEREBY ORDERED that the Clark County School District's
8 Motion to Stay Discovery (ECF No. [23]) is GRANTED pending the outcome of
9 the Motion to Dismiss and Plaintiff's Motion for Leave to File Second Amended
10 Complaint, which will be decided together.

11 IT IS FURTHER ORDERED that unless Plaintiff's Motion for Leave to File
12 Second Amended Complaint is denied with prejudice and the Motion to Dismiss
the First Amended Complaint is granted, discovery as to all claims permitted to
proceed will automatically recommence on the first Court day following the
issuance of the Court's Order. The parties will then have fourteen (14) days to meet,
confer, and file a revised discovery plan and scheduling order with the Court.

13 ECF No. 28. On May 30, 2025, the Court addressed Plaintiff's Motion for Leave to Amend
14 and Defendants' Motion to Dismiss in an Order which states in part,

15 Accordingly, IT IS HEREBY ORDERED that Plaintiff's Motion for Leave
16 to File Second Amended Complaint (ECF No. 19) is GRANTED IN PART and
DENIED IN PART.

17 IT IS FURTHER ORDERED that Plaintiff's Second Amended Complaint
18 may proceed on his civil conspiracy, Retaliation, and Equal Protection claims.
19 Plaintiff may not proceed on his Due Process claim, or any other claim that is
asserted on behalf of his daughter, so long as he is proceeding *pro se*.

20 IS IF FURTHER ORDERED that the Clerk of Court is to separate the
21 Second Amended Complaint and related exhibits at ECF No. 19 from pages 7 to
103 and file the same.

22 IT IS FURTHER ORDERED that Defendants' responsive pleading is due
no later than **June 16, 2025**.

23 ECF No. 29 (Emphasis in original). In accordance with the timeline noted in ECF No. 28, the
24 parties participated in a Rule 26 Conference on June 9, 2025 and now submit the (Proposed)
25 Discovery Plan and Scheduling Order.

PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER

The Parties discussed and agreed to propose a 180 day discovery period to being on June 16, 2025. This date was proposed based on the deadlines contained in recent Orders from the Court lifting the stay and resolving pending motions.

The Parties agree that discovery needs to be conducted on the claims that shall move forward as noted in the Order dated May 30, 2025 and defenses asserted by the Parties. ECF No. 29. The Parties do not believe that discovery needs to be conducted in phases.

1. Meeting: June 9, 2025

On June 9, 2025, the Parties participated in the Fed. R. Civ. P. 26(f) discovery conference via telephone. Plaintiff, JARON BRIGNAC appeared on behalf of himself. SAMI RANDOLPH, ESQ., appeared on behalf of Defendants.

2. Initial Disclosures: June 23, 2025

3. Discovery Plan, the parties propose the following discovery plan:

i. Amend Pleadings and/or Adding Parties: September 16, 2025

ii. Initial Expert Disclosure: October 16, 2025

iii. Rebuttal Expert Disclosure: November 17, 2025 (30 days fell on Saturday, November 15, 2025)

iv. Discovery Cutoff: December 15, 2025 (180 days fell on Saturday, December 13, 2025)

v. Dispositive Motion Deadline: January 14, 2026

vi. Joint Pre-Trial Order: February 13, 2026 or thirty (30) days after resolution of dispositive motions.

4. Alternative Dispute Resolution

The Parties certify that during the meet and confer the possibility of using alternative dispute-resolution processes including mediation, arbitration, and early neutral evaluation were discussed. The Plaintiff stated he is not interested in participating in ADR. Defendants are willing

to participate in a settlement conference utilizing the services of either a United States District Court Judge or United States Magistrate Judge with availability.

5. Alternative Forms of Case Disposition

The Parties discussed consent to trial by a magistrate judge and involvement of a magistrate judge in this matter. No agreement was reached on this issue.

6. Extensions or Modifications of the Discovery Plan and Scheduling Order LR

26-3 governs modifications or extensions of this Discovery Plan and Scheduling Order. Any stipulation or motion must be made at least twenty-one (21) days prior to the expiration of any extension thereof that may have been approved by the Court, or at least twenty-one (21) days prior to the expiration of the subject deadline.

Dated this 13th day of June, 2025.

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

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ORDER

IT IS SO ORDERED.


Dayna J. Zouchak
U.S. MAGISTRATE JUDGE
DATED: June 13, 2025